

Blaine J. Benard (#5661)
Brent E. Johnson (#7558)
Engels J. Tejeda (#11427)
HOLLAND & HART LLP
222 South Main Street, Suite 2200
Salt Lake City, UT 84101-2194
Telephone: 801.799.5800
BJBenard@hollandhart.com
BJohnson@hollandhart.com
EJTejeda@hollandhart.com

Attorneys for Defendant Uintah Basin Healthcare

**IN THE UNITED STATES DISTRICT COURT,
IN AND FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

JASON RASMUSSEN et al., on behalf of themselves and all others similarly situated;

Plaintiffs,

vs.

UINTAH BASIN HEALTHCARE, a Utah non-profit corporation;

Defendant.

SECOND STIPULATED MOTION TO EXTEND RESPONSE DEADLINE

2:23-cv-00322-HCN-DBP

Judge Howard C. Nielson, Jr.
Chief Magistrate Judge Dustin B. Pead

Defendant Uintah Basin Healthcare and Plaintiffs Donna Halton; Doris Hyatt; Mandy Keasler, on behalf of her minor son, A.K.; Christian Miller, Jason Rasmussen, and Mindy Rasmussen (the “Plaintiffs”), individually and on behalf of all similarly situated persons, file this Second Stipulated Motion to Extend Response Deadline pursuant to Rule 6(b) of the Federal Rules of Civil Procedure. *See Fed. R. Civ. P. 6(b)* (“the court may, for good cause, extend the time . . . if a request is made” before the original time expires). The Parties seek to extend Defendant’s response deadline in the above captioned consolidated case by two-weeks, from

October 2, 2023, to October 16, 2023. The Parties do not seek to change any of the related deadlines for the opposition or reply brief.

There is good cause to extend the response deadline. The Court previously ordered the Parties to stipulate to a briefing schedule. This short extension will allow Defendant sufficient time to finishing briefing a complex motion to dismiss, as well as accommodate counsels' schedules. This two-week extension will not unduly delay the case. Accordingly, the Parties respectfully seek a Court order that:

- The deadline for Defendant to file a Motion to Dismiss is extended to October 16, 2023.
- Plaintiffs' Opposition to the Motion to Dismiss is due 45 days from the date the Motion to Dismiss is filed.
- Defendant's Reply in Support of the Motion to Dismiss is due 30 days from the date of Plaintiffs' Opposition.

DATED this 29th day of September, 2023.

HOLLAND & HART LLP

/s/ Engels J. Tejeda
Blaine J. Benard
Brent E. Johnson
Engels J. Tejeda
Attorneys for Defendant

DATED this 29th day of September, 2023

CHESTNUT CAMBRONNE PA

/s/ Bryan L. Bleichner
(signed electronically by Filing Attorney with permission of Bryan Bleichner)
Bryan L. Bleichner
Philip J. Krzeski
Attorneys for Plaintiffs